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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA, : Case No. 2:09 CR 119 DB
Plaintiff, : NOTICE OF INTENT TO INTRODUCE
v. : EVIDENCE PURSUANT TO F.R.E. 404(b)
ALEX JASON HALL, : JUDGE DEE BENSON
Defendant. :
:

The United States, by and through the undersigned Assistant United States Attorney, files this Notice of Intent to Introduce Evidence Pursuant to Rule 404(b) of the Federal Rules of Evidence. The defendant has not requested this notice as required pursuant to Rule 404(b). Nevertheless, as a courtesy to counsel and the Court, the United States provides it. The proposed evidence of other crimes, wrongs, or acts is not offered to show conformity with a character trait of the defendant. Rather, the United States will offer the evidence as proof of "motive,

opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident.” F.R.E. 404(b).

The proposed evidence may be summarized as follows.

1. On September 4, 2008, Farmington City Police encountered defendant Alex Hall and co-defendant William Viehl sitting in the defendant’s Ford Explorer at 12:35 a.m. The vehicle was parked in very close proximity to the Lodder mink farm. Alex Hall was arrested on an outstanding arrest warrant, and incident to that arrest, his vehicle was searched. The police officer discovered items that are consistent with implements used in A.L.F. raids.
2. On September 21, 2008, the Lodder mink farm was, in fact, raided, and approximately 6000 mink were released. A.L.F. claimed responsibility for the raid on its NAALPO website.

The Court may note that these uncharged acts have previously been disclosed in discovery to the defendant.

Dated this 11th day of March, 2010.

CARLIE CHRISTENSEN
Acting United States Attorney

/s/ John W. Huber
JOHN W. HUBER
Assistant United States Attorney